IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC. d/b/a WRS MOTION PICTURE LABORATORIES, a corporation, Plaintiff, vs. PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual, Defendants	)	C.A. No. 00-2041

STIPULATION PURSUANT TO F.R.C.P. 62(d) FOR AN ORDER STAYING PROCEEDINGS TO ENFORCE JUDGMENT PENDING APPEAL

1. This Stipulation is made and executed by and between, Plaintiff, WRS, Inc., and Defendant, John Herklotz, by and through their respective counsel, Thomas E. Reilly and John Sieminski.

2. On November 9, 2007, Plaintiff WRS filed a Petition for Supplemental Relief in Aid of Execution of its Judgment against John C. Herklotz Pursuant to F.R.C.P. 69 and Pa. R.C.P. 3118. The Petition is designated on the Court's docket as a Motion (Document 162).

3. The parties have agreed, through counsel, to request an Order staying proceedings to execute upon or enforce the Judgment against Defendant Herklotz for thirty (30) days from the date of filing of this Stipulation. This period will allow the parties to continue discussions about an acceptable form of appeal

supersedeas, which discussions have been ongoing since the judgment was entered.

WHEREFORE, Defendant John Herklotz and Plaintiff WRS, through counsel, respectfully request that the Court hold any proceedings relative to enforcement and any consideration of the Petition Of Plaintiff, WRS, Inc., for Supplemental Relief in Aid of Execution of its Judgment Against John C. Herklotz Pursuant to F.R.C.P. 69 And Pa. R.C.P. 3118 in abeyance until December 31, 2007.

Respectfully submitted,

By: *John P. Sieminski*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **STIPULATION PURSUANT TO F.R.C.P. 62(d) FOR AN ORDER STAYING PROCEEDINGS TO ENFORCE JUDGMENT PENDING APPEAL** has been served on counsel listed below by electronic mail on this 30th day of November, 2007:

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